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12 *Attorneys for Debtors and Reorganized Debtors*

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON  
REORGANIZED DEBTORS' SIXTH  
OMNIBUS OBJECTION TO CLAIMS  
(SATISFIED CLAIMS)**

**Response Deadline:  
September 29, 2020, 4:00 p.m. (PT)**

**Hearing Information If Timely Response  
Made:**

Date: October 13, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1       **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation  
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as  
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the  
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the  
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5       **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
6 **October 13, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable  
7 Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended*  
8 *General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020,  
9 **the Omnibus Hearing will be conducted telephonically. The courtroom will be closed.** All parties  
10 who wish to appear at the Omnibus Hearing must make arrangements to appear telephonically with  
11 CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day before the Omnibus  
Hearing. Further information regarding telephonic appearances via CourtCall can be found on the  
Bankruptcy Court’s website, at the following location: [www.canb.uscourts.gov](http://www.canb.uscourts.gov) > Rules and  
Procedures > District Procedures > Policy and Procedure for Appearances by Telephone. Charges  
have been waived by CourtCall for pro se parties.

12       **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the  
13 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Sixth Omnibus*  
14 *Objection to Claims (Satisfied Claims)*, filed on September 3, 2020 [Dkt. No. 8978] (the “**Omnibus**  
**Objection**”).

15       **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus  
16 Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the  
17 Reorganized Debtors at the above-referenced address or by email at [PGElclaims@kbbkllp.com](mailto:PGElclaims@kbbkllp.com) so as to  
18 be received by no later than **4:00 p.m. (Pacific Time) on September 29, 2020**. Any oppositions or  
19 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing*  
20 *Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,  
21 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief**  
**requested in the Omnibus Objection may be granted without a hearing if no opposition is timely**  
**filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the  
Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and  
related Adversary Proceedings.

22       **PLEASE TAKE FURTHER NOTICE** that a customized Sixth Omnibus Claim Objection  
23 Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the parties to  
whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

24       **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its  
25 supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at  
26 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
27 Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims  
28 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll  
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:  
[pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
Bankruptcy Court’s website.

1 Dated: September 3, 2020

**KELLER BENVENUTTI KIM LLP**

2 /s/ Peter J. Benvenutti

3 Peter J. Benvenutti

4 *Attorneys for Debtors and Reorganized Debtors*

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**Exhibit A**  
**Sixth Omnibus Claim Objection Notice**

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12 *Attorneys for Debtors and Reorganized Debtors*

**THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.**

**CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217**

**THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.**

13  
14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**  
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation  
24 ☐ Affects Pacific Gas and Electric Company  
25 ☒ Affects both Debtors

26 *\* All papers shall be filed in the Lead Case, No.*  
27 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED DEBTORS' SIXTH OMNIBUS OBJECTION TO CLAIMS (SATISFIED CLAIMS)**

**Response Deadline:**  
**September 29, 2020, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: October 13, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

[Claimant Name]

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

On September 3, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Sixth Omnibus Objection to Claims (Satisfied Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

**Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by September 29, 2020 (the “Response Deadline”);**

**Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;**

**If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.**

**If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.**

**If you file and serve a timely Response, the date, location and time of the Hearing are:**

**October 13, 2020 at 10:00 a.m. (Pacific Time)**

**Courtroom 17, 16<sup>th</sup> Floor, 450 Golden Gate Ave., San Francisco, CA**

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically or by video conference. The courtroom will be closed.** All parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website, [www.canb.uscourts.gov](http://www.canb.uscourts.gov) > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

1       **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**  
 2       **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

3       **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus  
 4       Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined  
 5       therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim  
 6       has been satisfied or released during or prior to these Chapter 11 Cases in accordance with the  
 7       Bankruptcy Code, any applicable rules, or Court orders. If you do **NOT** oppose the disallowance of  
 8       your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a written Response to  
 9       this Omnibus Objection and you do NOT need to appear at the Hearing. If you do nothing, the  
 10      Objected-To Claim(s) will be disallowed. To the extent your Proof(s) of Claim relates to protective,  
 11      unliquidated claims relating to the Reorganized Debtors’ potential post-petition non-performance  
 12      under an assumed agreement, you retain all remedies that would have existed had these Chapter 11  
 13      Cases not been filed, and the Reorganized Debtors represent that they will not raise any bankruptcy  
 14      defenses.

15      **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your  
 16      Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in  
 17      writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at  
 18      PGEclaims@kbklp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on September**  
 19      **29, 2020 (the “Response Deadline”):** You must file the Response through the Court’s electronic case  
 20      filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’  
 21      Counsel will occur automatically upon ECF filing; and no separate service of your Response is  
 22      required. If you do NOT have access to the ECF system, service must be made by electronic mail to  
 23      the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must  
 24      arrange for the Response to be filed with the Court within two business days thereafter. If you do not  
 25      have the ability to serve a Response electronically, the Response must be served by mail, express or  
 26      some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the  
 27      Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or  
 28      commercial express service that will make actual delivery not more than two business days after the  
 29      Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by  
 30      email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,  
 31      the number of the Omnibus Objection, and the fact that a paper Response is being delivered by  
 32      express.

33      **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:  
 34      (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the  
 35      case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the  
 36      assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of  
 37      Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain  
 38      the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal  
 39      knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,  
 40      and/or the name, address, and telephone number of your attorney and/or designated representative to  
 41      whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the  
 42      name, address, telephone number, and email address of the party with authority to reconcile, settle, or  
 43      otherwise resolve the Omnibus Objection on your behalf, if any.

1 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,  
2 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a  
later date. You will receive a separate notice of any such objection.

3 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus  
4 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:  
5 (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account  
6 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim  
agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,  
by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com) to  
request a complete copy of the Omnibus Objection, including all Exhibits.

7 Dated: September 3, 2020

**KELLER BENVENUTTI KIM LLP**

8 /s/ Peter J. Benvenutti

9 Peter J. Benvenutti

10 *Attorneys for Debtors and Reorganized Debtors*